

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ELI REISMAN,

Plaintiff,

v.

GEN DIGITAL INC.,

Defendant,

CASE NO.: 2:25-CV-01316-BRM-SDA

**STIPULATION TO TRANSFER  
ACTION TO UNITED STATES  
DISTRICT COURT, DISTRICT OF  
ARIZONA PURSUANT TO 28 U.S.C §  
1404(a); ~~PROPOSED~~ ORDER**

Plaintiff Eli Reisman (“Plaintiff”) and Defendant Gen Digital Inc. (“Gen”), by and through their respective counsel, jointly submit the following Stipulation to transfer venue of this action to the United States District Court, District of Arizona, and [Proposed] Order.

**Stipulation**

WHEREAS, on February 18, 2025, Plaintiff filed a putative class action complaint against Gen for alleged violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227.

WHEREAS, on April 14, 2025, Gen filed correspondence with the Court, pursuant to the Court’s preferences, requesting a pre-motion conference on a motion Gen intended to file: (1) to dismiss Plaintiff’s complaint pursuant to Fed. R. Civ. P. 12(b)(2); or, (2) to transfer this matter to the United States District Court for the District of Arizona.

WHEREAS, following Gen’s aforementioned filing, the parties met and conferred in good faith, and have agreed to request that the Court transfer this case to the United States District Court, District of Arizona.

In light of the foregoing, the parties STIPULATE that this case shall be transferred to the United States District Court, District of Arizona, and request that the Court order this transfer of venue.

DATED: April 28, 2025

**KNUCKLES & MANFRO LLP**

By: /s/ John E. Brigandi  
JOHN E. BRIGANDI  
600 East Crescent Avenue, Suite 201  
Upper Saddle River, NJ 07458  
(201) 391-0370  
[jeb@km-llp.com](mailto:jeb@km-llp.com)  
Attorneys for Defendant Gen Digital Inc.

DATED: April 28, 2025

**THE WEITZ FIRM, LLC**

By: /s/ Max S. Morgan  
MAX S. MORGAN  
1515 Market Street #1100  
Philadelphia, PA 19101  
(267) 587-6240  
[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)

Counsel for Plaintiff Eli Reisman

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ELI REISMAN,

Plaintiff,

v.

GEN DIGITAL INC.,

Defendant,

CASE NO.: 2:25-CV-01316-BRM-SDA

**PROPOSED ORDER**

THIS MATTER comes before the Court on the Stipulation to Transfer Venue to the United States District Court for the District of Arizona.

Pursuant to 28 U.S.C. § 1404(a), in the interest of justice, IT IS HEREBY ORDERED that the Joint Stipulation is APPROVED. The Clerk is directed to transfer this case to the United States District Court for the District of Arizona. No further proceedings shall be had in this Court.

IT IS FURTHER ORDERED that Defendant Gen Digital Inc. shall respond to Plaintiff's Complaint by no later than fourteen (14) days after the clerk of the United States District Court for the District of Arizona gives notice that the case has been received and a new case number has been assigned.

SO ORDERED:

/s/Brian R. Martinotti  
JUDGE, U.S. District Court  
District of New Jersey